

FORM 1 GENERAL		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER VAD003112265		T/A C		D	
LABEL ITEMS				GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.					
I. EPA I.D. NUMBER									
III. FACILITY NAME									
V. FACILITY MAILING ADDRESS									
VI. FACILITY LOCATION									
II. POLLUTANT CHARACTERISTICS									
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms .									
SPECIFIC QUESTIONS				Mark "X"			Mark "X"		
				YES	NO	FORM ATTACHED			
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)					X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		
				16	17	18			
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)				X		X	D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		
				22	23	24			
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)					X		F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		
				28	29	30			
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)					X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		
				34	35	36			
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)					X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		
				40	41	42			
III. NAME OF FACILITY									
1 SKIP INTERNATIONAL PAPER - FRANKLIN MILL									
15 16 - 29 30 69									
IV. FACILITY CONTACT									
A. NAME & TITLE (last, first, & title)									
2 DUFFY, KYLE (ENVIRONMENTAL HEALTH AND SAFETY MANAGER)									
15 16 45 46 48 49 51 52 55									
B. PHONE (area code & no.)									
(757) 569-4536									
V. FACILITY MAILING ADDRESS									
A. STREET OR P.O. BOX									
3 34040 UNION CAMP DRIVE									
15 16 45									
B. CITY OR TOWN									
4 FRANKLIN									
15 16 40 41 42 47 51									
C. STATE									
VA									
D. ZIP CODE									
23851									
VI. FACILITY LOCATION									
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER									
5 34040 UNION CAMP DRIVE									
15 16 45									
B. COUNTY NAME									
ISLE OF WIGHT									
46 70									
C. CITY OR TOWN									
6 FRANKLIN									
15 16 40 41 42 47 51 52 54									
D. STATE									
VA									
E. ZIP CODE									
23851									
F. COUNTY CODE (if known)									

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
C	7	2	6	1	1	(specify) KRAFT PULPING AND RECOVERY	C	7	2	4	2	1	(specify) PAPER MILLS						
15	16	17	18	19		15	16	17	18	19									
C. THIRD										D. FOURTH									
C	7	2	6	2	1	(specify) CONVERTED PAPER PRODUCTS	C	7	2	6	7	9	(specify) SAW MILL AND PLANING GENERAL						
15	16	17	18	19		15	16	17	18	19									

VIII. OPERATOR INFORMATION

A. NAME																									B. Is the name listed in Item VIII-A also the owner?						
C	8	I	N	T	E	R	N	A	T	I	O	N	A	L	P	A	P	E	R	C	O	M	P	A	N	Y	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40						
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other," specify.)																									D. PHONE (area code & no.)						
F = FEDERAL S = STATE P = PRIVATE										M = PUBLIC (other than federal or state) O = OTHER (specify)										P (specify)					A (757) 569-4536						
																				56					15 16 17 18 19 20 21 22 23 24 25						

E. STREET OR P.O. BOX																									F. CITY OR TOWN					G. STATE		H. ZIP CODE		IX. INDIAN LAND	
34040 UNION CAMP DRIVE																									FRANKLIN					VA		23851		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
C	9	N								C	9	P							
15	16	17	18	19	20	21	22	23	24	15	16	17	18	19	20	21	22	23	24
SEE ATTACHED										SEE ATTACHED									
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
C	9	U								C	9								
15	16	17	18	19	20	21	22	23	24	15	16	17	18	19	20	21	22	23	24
N/A										SEE ATTACHED (specify)									
C. RCRA (Hazardous Wastes)										E. OTHER (specify)									
C	9	R								C	9								
15	16	17	18	19	20	21	22	23	24	15	16	17	18	19	20	21	22	23	24
SEE ATTACHED										SEE ATTACHED (specify)									

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers, and other surface water bodies in the map area. See instructions for precise requirements.

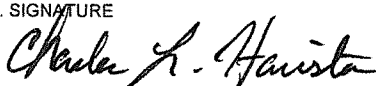
XII. NATURE OF BUSINESS (provide a brief description)

THE INTERNATIONAL PAPER - FRANKLIN MILL DISCHARGES WASTEWATER AND STORMWATER ASSOCIATED WITH THE MANUFACTURE OF FLUFF PULP, TISSUE, AND RECYCLED (CONVERTED) PAPERS, WHICH ARE GENERATED FROM RAW TIMBER, PURCHASED WOOD CHIPS AND SORTED OFFICE WASTE PAPER FROM THE FIBER RECYCLING PLANT. PRODUCTION FACILITIES, ADMINISTRATIVE OFFICES, AND WAREHOUSING OPERATIONS ARE LOCATED ON THE MILL SITE. INTERNATIONAL PAPER OPERATES ONE MACHINE WHICH PRODUCES FLUFF PULP. A TENANT, ST TISSUE, IS ALSO LOCATED AT THE MILL SITE AND MANUFACTURES TISSUE. ST TISSUE OPERATIONS INCLUDE ONE PAPER MACHINE, THE FIBER RECYCLING PLANT, ADMINISTRATIVE OFFICES, AND WAREHOUSING OPERATIONS.

IP FRANKLIN MILL'S WASTEWATER TREATMENT SYSTEM ALSO RECEIVES KILN BLOWDOWN AND SURFACE WATER FROM FRANKLIN LUMBER COMPANY, A SAWMILL LOCATED NEARBY.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)										B. SIGNATURE										C. DATE SIGNED									
Charles L. Hairston Mill Manager																				5-18-15									

COMMENTS FOR OFFICIAL USE ONLY

COMMENTS FOR OFFICIAL USE ONLY																									
C																									
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)

- ☐ VPDES Permit No. VA0004162

B. UIC (Underground Injection of Fluids)

NONE

C. RCRA (Hazardous Waste)

- ☐ Hazardous Waste Management and Facility Wide Corrective Action Permit

D. PSD (Air Emissions from Proposed Sources)

NONE

E. Other (Industrial Waste Landfill Operation)

- ☐ VADEQ Solid Waste Facility Permit No. 504

E. Other (Water Works)

- ☐ VDH Water Works Operation Permit No. 3093800

E. Other (Small Dam Structures)

- ☐ Dam Safety Regular Operations and Maintenance Certificate, High Hazard Dam, Inventory #80017 (Dept. of Conservation and Recreation)
- ☐ Dam Safety Conditional Operations and Maintenance Certificate, Low Hazard Dam, Inventory #09312 and #09313 (Dept. of Conservation and Recreation)

E. Other (Groundwater Withdrawal)

- ☐ VADEQ Groundwater Withdrawal Permit #GW0042000

E. Other (Wetlands Permits)

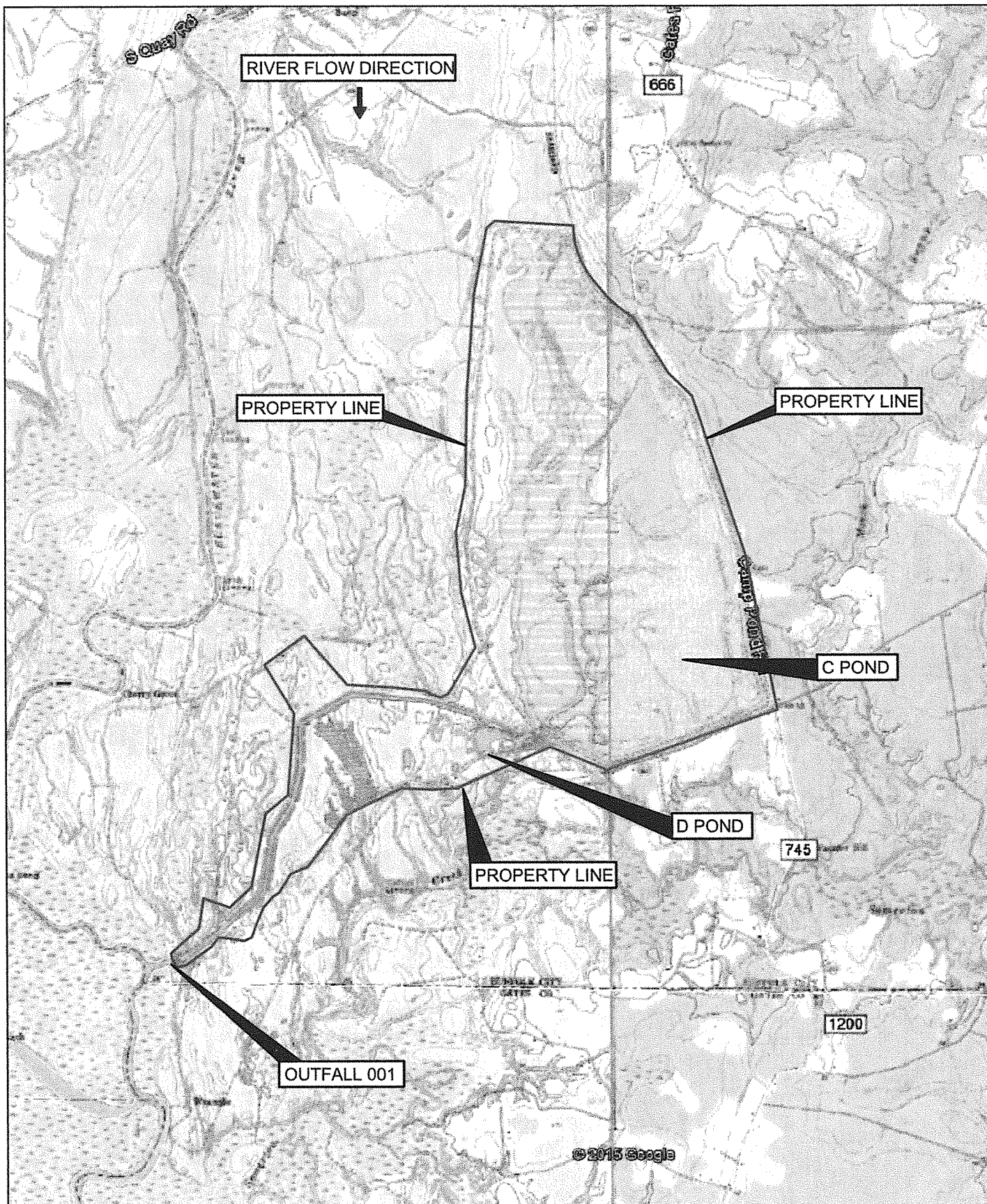
- ☐ VWP Individual Permit #04-1729 (Landfill expansion)

E. Other (Air Permits)

- ☐ Title V (DEQ Registration #60214, AIRS ID#51-093-0006
- ☐ State Operating Permit (includes Site-Wide Cap- 9 VAC 5 Chapter 230)

E. Other (Construction Stormwater General Permit)

- ☐ VSMP Construction Stormwater General Permit # VAR10-12-100839



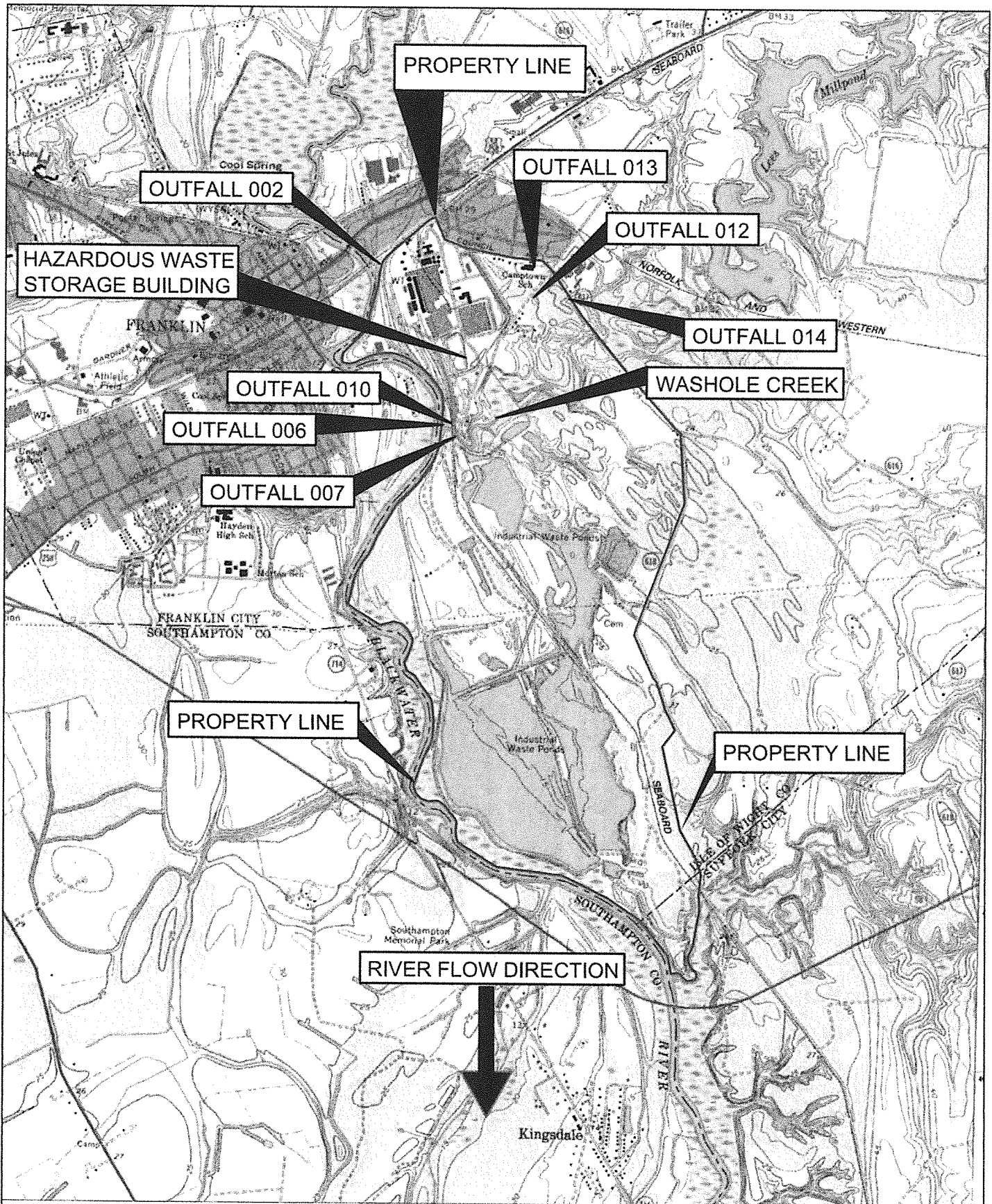
AECOM

International Paper
NPDES Form 1, Section XI
Map D - Effluent Pond



0 0.25 0.5 1.0

GRAPHIC SCALE (IN MILES)



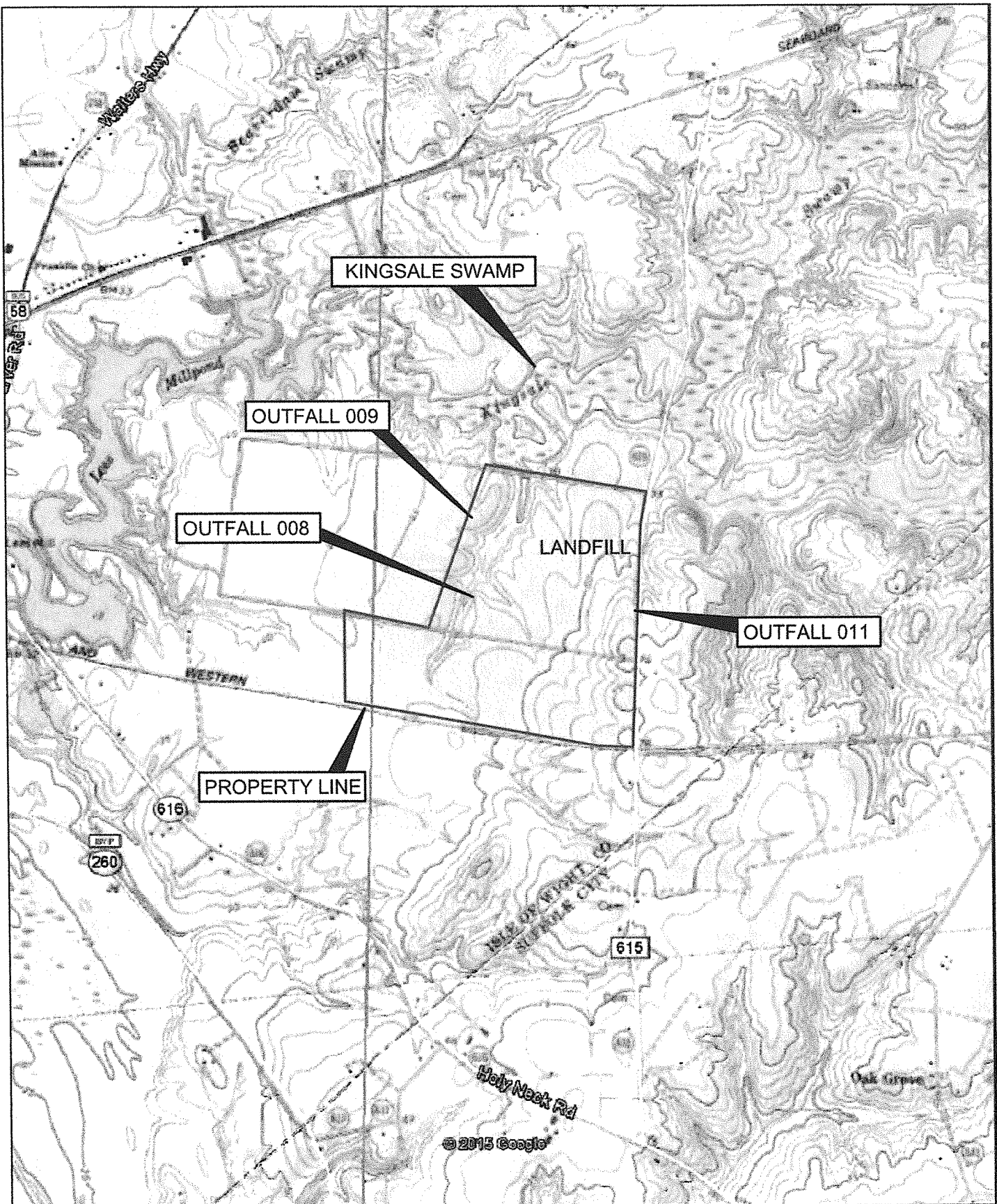
AECOM

International Paper
NPDES Form 1, Section XI
Map B - Facility



0 0.25 0.5 1.0

GRAPHIC SCALE (IN MILES)



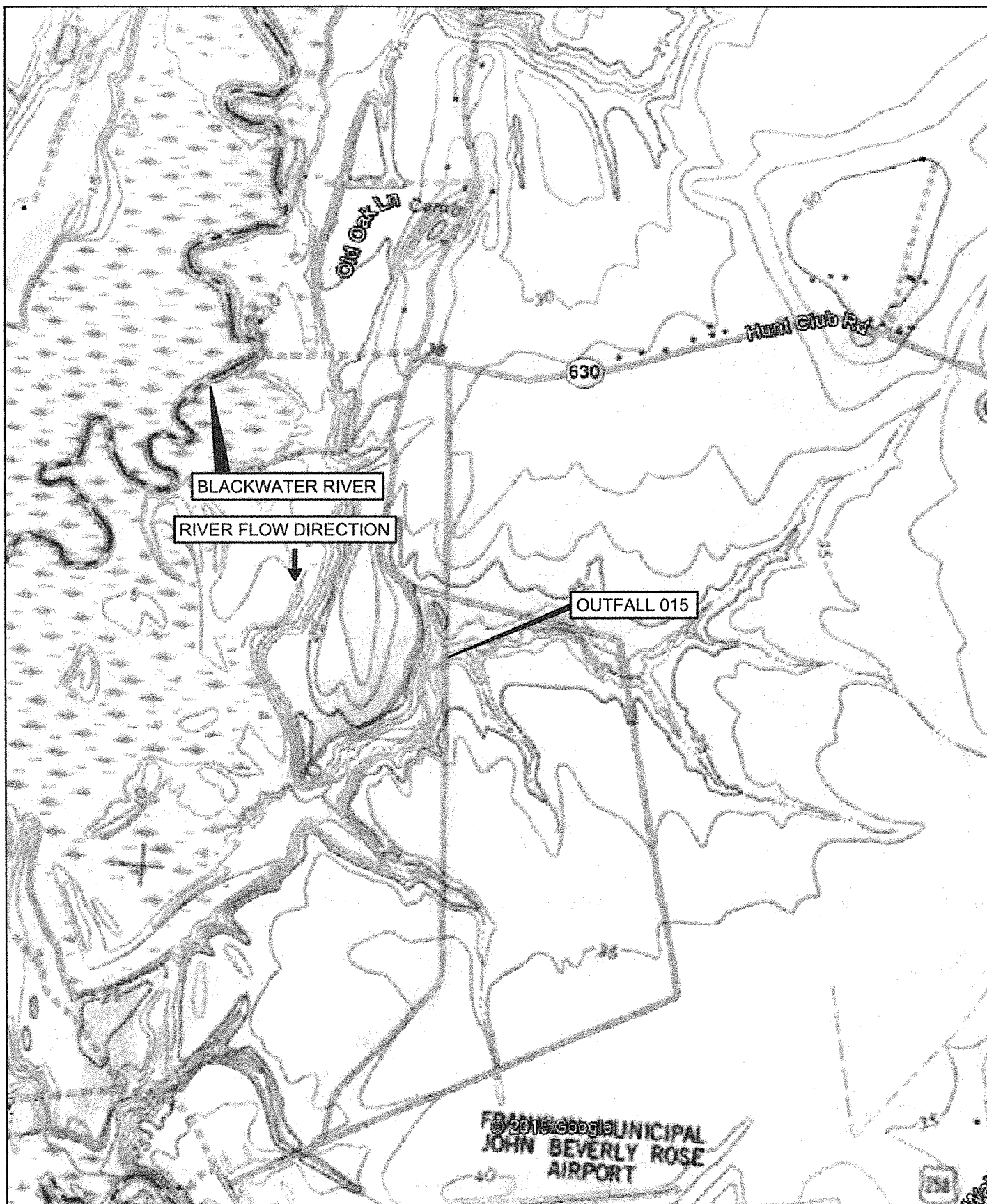
AECOM

International Paper
NPDES Form 1, Section XI
Map C - Landfill



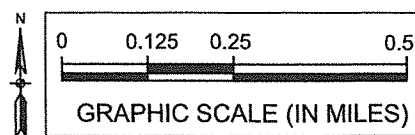
0 0.125 0.25 0.5

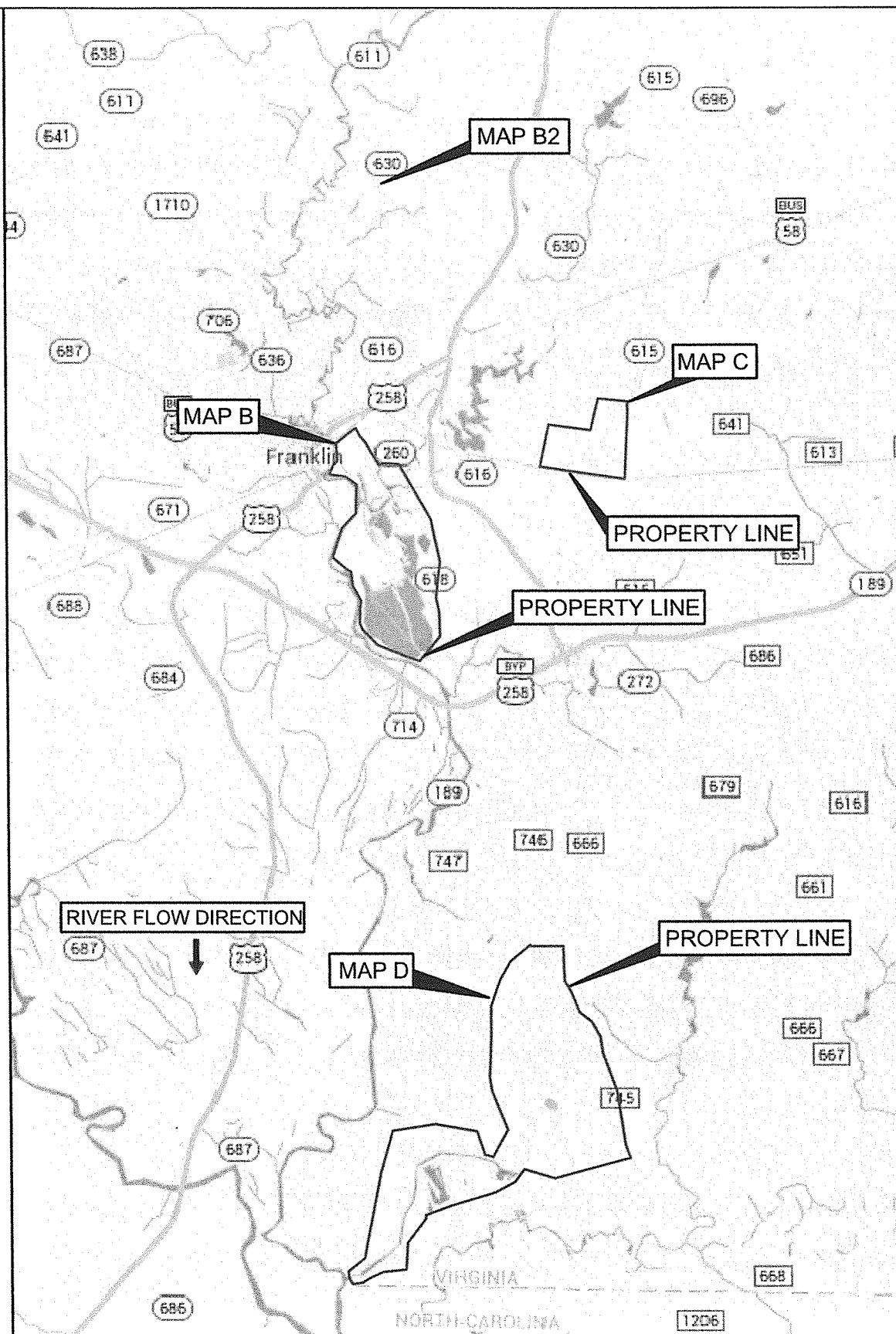
GRAPHIC SCALE (IN MILES)



AECOM

International Paper
NPDES Form 1, Section XI
Map B2 - North Well Field





AECOM

International Paper
NPDES Form 1, Section XI
Map A - Property Layout



0 0.25 0.5 1.0
GRAPHIC SCALE (IN MILES)

FORM 2 C - Section II.B INSERT

1. Outfall		2. Operations Contributing Flow		3. Treatment	
No.		a. Operation (list)	b. Average Flow (mgd)	a. Description	b. List Codes from Table 2C
001	103	Kraft Pulping & Recovery (SIC 2611) (Includes woodyard, batch and continuous digesters; chemical and heat recovery operations; turpentine processing; power and steam generation, pulp bleaching, fluff pulp forming and tissue manufacturing Bleaching Operations F Bleach Line (Internal outfall) The F bleach line employs Advanced ECF bleaching technology to achieve Tier I VATIP (Voluntary Advanced Technology Incentives Program)	10.8 (1)	PRIMARY TREATMENT	
				Mechanical Bar Screens	1-T
				Screened Material to Landfill	5-Q
				Clarification Clarifier #1 - 230 ft diameter 2 - 800 gpm sludge pumps Clarifier #2 - 205 ft diameter 2 - 800 gpm sludge pumps	1-U
001		Tissue Manufacturing and Converting SIC 2621,2679 (Includes deinking, tissue manufacturing and converting by ST Tissue mfg, Phase 1)	2.8 (1)	Sludge Dewatering 2 - 2.0 Meter Belt Filter Presses w/ gravity thickeners 90 tons/day capacity each Sludge Feed Tank (62,000 gals) 3 Centrifugal Sludge Feed Pumps Solids to Landfill	5-C & 5-L
001		Other Sawmill Activities (SIC 2421) (4) (kiln blowdown and stormwater from around a repair shop that has been pretreated through an oil water separator from Franklin Lumber Co.)	0.001		5-Q
001		Stormwater Runoff (25 yr/24Hr Peak) (2) (3) Bleach Plant Main Mill Cust. Svc. & Main Mill Channel Areas East Channel/High Gr/Main Off. Areas South Woodyard Sheet Finishing Highground Pond Fiber Recycling Plant Area Remote Coal Storage Pile	5.00 40.00 64.00 93.00 40.00 51.00 2.90 3.90 0.17	SECONDARY TREATMENT Overflow from the clarifiers, stormwater runoff & landfill leachate, receive secondary treatment as follows: Aerated Stabilization Basin HRT = 7 days Total Aeration HP = 1650 Two Baffle Curtains	3 - B
001		Misc 910 Turbine Generator (5) Active Landfill - Leachate (5)	0.01 0.03	Holding Pond (C Pond) 11 Billion Gallon Class II Dam for effluent storage from April - Oct	3-G
Notes: (1) Flows measured from 2/2013 - 2/2015 (2) Stormwater flows are peak values based on a report from Davis and Floyd, March 1997 and are based on a 25 Yr/24 hr rainfall event. (3) Stormwater flows are accounted for in the average flows to the Effluent Treatment System; the peak number indicated is estimated and is not included in this average number. (4) The sawmill is not part of the facility proper. (5) Flow provided is an estimated nominal flow				Discharge Channel (D Pond) Conveyance channel for effluent releases (Nov - Mar)	None
				Outfall 001	4-A

FORM 2 C - Section III.C INSERT
Internal Outfall Information

Outfall Number	Bleach Line	Bleaching Sequence	Fiber Furnish	Unfinished Pulp Entering Bleach Plant		
				Maximum Daily Production (ADTPD)	Long-Term Avg Production (ADTPD)	Long-Term Avg Flow (MGD)
103	F	ODED	SW	1,320	920	2.73
103	F	ODED (w/semi)	SW	TBD	TBD	

ADTPD Air Dried Tons per Day
SW Softwood furnish
Semi Semi-bleached pulp comes off the O2 stage without entering the bleach plant
TBD Future fluff pulp product to be determined at a later date
Flows are projected estimates.
Production rate as defined at 40 CFR 430.01n

International Paper - Franklin Mill
VPDES Permit No VA0004162

EPA I.D. NUMBER (copy from Item 1 of Form 1)
VAD003112265

Form Approved.
OMB No. 2040-0086.
Approval expires 3-31-98.

Please print or type in the unshaded areas only.

FORM 2C NPDES		U.S. ENVIRONMENTAL PROTECTION AGENCY APPLICATION FOR PERMIT TO DISCHARGE WASTEWATER EXISTING MANUFACTURING, COMMERCIAL, MINING AND SILVICULTURE OPERATIONS <i>Consolidated Permits Program</i>					
I. OUTFALL LOCATION							
For each outfall, list the latitude and longitude of its location to the nearest 15 seconds and the name of the receiving water.							
A. OUTFALL NUMBER <i>(list)</i>	B. LATITUDE			C. LONGITUDE			D. RECEIVING WATER <i>(name)</i>
	1. DEG.	2. MIN.	3. SEC.	1. DEG.	2. MIN.	3. SEC.	
001	36.00	33.00	13.40	76.00	54.00	46.50	BLACKWATER RIVER
103	36.00	40.00	49.00	76.00	54.00	46.00	INTERNAL OUTFALL (F BLEACH)
II. FLOWS, SOURCES OF POLLUTION, AND TREATMENT TECHNOLOGIES							
<p>A. Attach a line drawing showing the water flow through the facility. Indicate sources of intake water, operations contributing wastewater to the effluent, and treatment units labeled to correspond to the more detailed descriptions in Item B. Construct a water balance on the line drawing by showing average flows between intakes, operations, treatment units, and outfalls. If a water balance cannot be determined (e.g., for certain mining activities), provide a pictorial description of the nature and amount of any sources of water and any collection or treatment measures.</p> <p>B. For each outfall, provide a description of: (1) All operations contributing wastewater to the effluent, including process wastewater, sanitary wastewater, cooling water, and storm water runoff; (2) The average flow contributed by each operation; and (3) The treatment received by the wastewater. Continue on additional sheets if necessary.</p>							
1. OUTFALL NO. <i>(list)</i>	2. OPERATION(S) CONTRIBUTING FLOW			3. TREATMENT			
	a. OPERATION <i>(list)</i>	b. AVERAGE FLOW <i>(include units)</i>		a. DESCRIPTION		b. LIST CODES FROM TABLE 2C-1	
001	SEE ATTACHED						
103	SEE ATTACHED						
OFFICIAL USE ONLY <i>(effluent guidelines sub-categories)</i>							

CONTINUED FROM THE FRONT

C. Except for storm runoff, leaks, or spills, are any of the discharges described in Items II-A or B intermittent or seasonal?

☒ YES (complete the following table)☐ NO (go to Section III)

1. OUTFALL NUMBER (list)	2. OPERATION(s) CONTRIBUTING FLOW (list)	3. FREQUENCY		4. FLOW				
		a. DAYS PER WEEK (specify average)	b. MONTHS PER YEAR (specify average)	a. FLOW RATE (in mgd)		B. TOTAL VOLUME (specify with units)		C. DURATION (in days)
				1. LONG TERM AVERAGE	2. MAXIMUM DAILY	1. LONG TERM AVERAGE	2. MAXIMUM DAILY	
001	SEE INSERT FOR 2C.II.B FOR DESCRIPTION OF CONTRIBUTING FLOWS. OUTFALL DISCHARGE SEASON IS NOV. 1 - MAR. 31 ANNUALLY AS ALLOWED BY PERMIT, ALTHOUGH TYPICALLY DISCHARGES ARE COMPLETED WITHIN 2 MONTHS. DISCHARGES ARE CONTROLLED BY SLUICE GATES. GATES ARE ONLY OPENED WHEN DISSOLVED OXYGEN MONITORING INDICATES IT IS SAFE TO DO SO (BASED ON VPDES PERMIT CONDITIONS). ONCE OPENED, GATES REMAIN OPEN UNTIL STORAGE LEVEL IN "C" POND HAS DRAINED TO PRE-DETERMINED LEVEL.	7	2	95.3 MGD	185 MGD			60

III. PRODUCTION

A. Does an effluent guideline limitation promulgated by EPA under Section 304 of the Clean Water Act apply to your facility?

☒ YES (complete Item III-B)☐ NO (go to Section IV)

B. Are the limitations in the applicable effluent guideline expressed in terms of production (or other measure of operation)?

☐ YES (complete Item III-C)☒ NO (go to Section IV)

C. If you answered "yes" to Item III-B, list the quantity which represents an actual measurement of your level of production, expressed in the terms and units used in the applicable effluent guideline, and indicate the affected outfalls.

1. AVERAGE DAILY PRODUCTION			2. AFFECTED OUTFALLS (list outfall numbers)
a. QUANTITY PER DAY	b. UNITS OF MEASURE	c. OPERATION, PRODUCT, MATERIAL, ETC. (specify)	
877	AVERAGE ADTPD (AIR DRIED TONS PER DAY)	FLUFF PULP (February 2013- February 2015)	001
147	AVERAGE ADTPD (AIR DRIED TONS PER DAY)	Finished Tissue (February 2013- February 2015)	001

IV. IMPROVEMENTS

A. Are you now required by any Federal, State or local authority to meet any implementation schedule for the construction, upgrading or operations of wastewater treatment equipment or practices or any other environmental programs which may affect the discharges described in this application? This includes, but is not limited to, permit conditions, administrative or enforcement orders, enforcement compliance schedule letters, stipulations, court orders, and grant or loan conditions.

☐ YES (complete the following table)☒ NO (go to Item IV-B)

1. IDENTIFICATION OF CONDITION, AGREEMENT, ETC.	2. AFFECTED OUTFALLS		3. BRIEF DESCRIPTION OF PROJECT	4. FINAL COMPLIANCE DATE	
	a. NO.	b. SOURCE OF DISCHARGE		a. REQUIRED	b. PROJECTED

B. OPTIONAL: You may attach additional sheets describing any additional water pollution control programs (or other environmental projects which may affect your discharges) you now have underway or which you plan. Indicate whether each program is now underway or planned, and indicate your actual or planned schedules for construction.

☐ MARK "X" IF DESCRIPTION OF ADDITIONAL CONTROL PROGRAMS IS ATTACHED

EPA I.D. NUMBER (copy from Item 1 of Form I)

VAD003112265

CONTINUED FROM PAGE 2

V. INTAKE AND EFFLUENT CHARACTERISTICS

A, B, & C: See instructions before proceeding – Complete one set of tables for each outfall – Annotate the outfall number in the space provided.

NOTE: Tables V-A, V-B, and V-C are included on separate sheets numbered V-1 through V-9.

D. Use the space below to list any of the pollutants listed in Table 2c-3 of the instructions, which you know or have reason to believe is discharged or may be discharged from any outfall. For every pollutant you list, briefly describe the reasons you believe it to be present and report any analytical data in your possession.

1. POLLUTANT	2. SOURCE	1. POLLUTANT	2. SOURCE
SEE INSERT FOR 2C.V.D			

VI. POTENTIAL DISCHARGES NOT COVERED BY ANALYSIS

Is any pollutant listed in Item V-C a substance or a component of a substance which you currently use or manufacture as an intermediate or final product or byproduct?

☐ YES (list all such pollutants below)☒ NO (go to Item VI-B)

CONTINUED FROM THE FRONT

VII. BIOLOGICAL TOXICITY TESTING DATA

Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made on any of your discharges or on a receiving water in relation to your discharge within the last 3 years?

☒ YES (identify the test(s) and describe their purposes below)

☐ NO (go to Section VIII)

ACUTE AND CHRONIC TOXICITY TESTS ON CERIODAPHNIA DUBIA HAVE BEEN PERFORMED BY COASTAL BIOANALYSTS IN ACCORDANCE WITH PART I.D OF EXISTING VPDES PERMIT. THE RESULTS FOR THE PAST THREE YEARS ARE:

DATE	LC50 (%) ACUTE
1/19/2013	>100%
1/31/2014	>100%
1/22/2014	>100%
2/5/2014	>100%
1/13/2015	>100%
2/10/2015	>100%

DATE	NOEC (%) CHRONIC
1/15/2013	100%
1/29/2013	75%
1/21/2014	100%
2/4/2014	75%
1/12/2015	56%
2/9/2015	100%

VIII. CONTRACT ANALYSIS INFORMATION

Were any of the analyses reported in Item V performed by a contract laboratory or consulting firm?

☒ YES (list the name, address, and telephone number of, and pollutants analyzed by, each such laboratory or firm below)

☐ NO (go to Section IX)

A. NAME	B. ADDRESS	C. TELEPHONE (area code & no.)	D. POLLUTANTS ANALYZED (list)
JAMES R REED & ASSOCIATES	770 PILOT HOUSE DRIVE, NEWPORT NEWS, VA 23606	757-873-4703	ALL POLLUTANTS REPORTED IN PART 2C.V ANALYSES
COASTAL BIOANALYSTS, INC.	6400 ENTERPRISE COURT, GLOUCESTER, VA 23061	804-694-8285	OUTFALL 001 EFFLUENT TOXICITY

IX. CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A. NAME & OFFICIAL TITLE (type or print)

Charles L. Hairston Mill Manager

B. PHONE NO. (area code & no.)

(757) 569-4848

C. SIGNATURE

Charles L. Hairston

D. DATE SIGNED

5-18-15

Continued from the Front

IV. Narrative Description of Pollutant Sources

A. For each outfall, provide an estimate of the area (include units) of impervious surfaces (including paved areas and building roofs) drained to the outfall, and an estimate of the total surface area drained by the outfall.

Outfall Number	Area of Impervious Surface (provide units)	Total Area Drained (provide units)	Outfall Number	Area of Impervious Surface (provide units)	Total Area Drained (provide units)
002	0 SQ. FT.	2.4 AC	011	0 SQ. FT.	22.8 AC
006	0 SQ. FT.	12.5 AC	012	0 SQ. FT.	4.7 AC
007	0 SQ. FT.	2.3 AC	013	0 SQ. FT.	2.8 AC
008	0 SQ. FT.	24 AC	014	0 SQ. FT.	4.5 AC
009	0 SQ. FT.	21 AC	010, 015	N/A	N/A

B. Provide a narrative description of significant materials that are currently or in the past three years have been treated, stored or disposed in a manner to allow exposure to storm water; method of treatment, storage, or disposal; past and present materials management practices employed to minimize contact by these materials with storm water runoff; materials loading and access areas, and the location, manner, and frequency in which pesticides, herbicides, soil conditioners, and fertilizers are applied.


SEE ATTACHED

C. For each outfall, provide the location and a description of existing structural and nonstructural control measures to reduce pollutants in storm water runoff; and a description of the treatment the storm water receives, including the schedule and type of maintenance for control and treatment measures and the ultimate disposal of any solid or fluid wastes other than by discharge.

Outfall Number	Treatment	List Codes from Table 2F-1
002, 006, 007, 008, 009, 011, 012, 013, 014	SEE ATTACHED	1-U, 4-A

V. Nonstormwater Discharges

A. I certify under penalty of law that the outfall(s) covered by this application have been tested or evaluated for the presence of nonstormwater discharges, and that all nonstormwater discharged from these outfall(s) are identified in either an accompanying Form 2C or Form 2E application for the outfall.

Name and Official Title (type or print)	Signature	Date Signed
Charles L. Hairston, Mill Manager		5-18-15

B. Provide a description of the method used, the date of any testing, and the onsite drainage points that were directly observed during a test.

STORMWATER OUTFALLS 002, 006, 007, 008, 009, 011, 012, 013, AND 014 ARE MONITORED THROUGH VISUAL OBSERVATION PER THE STORMWATER POLLUTION PREVENTION PLAN. FOR THIS APPLICATION, ANALYSES FOR OIL AND GREASE, BOD5, COD, TSS, TOTAL NITROGEN, AND TOTAL PHOSPHORUS WERE SAMPLED AT OUTFALLS 002, 006, 009, AND 012. OUTFALL 006 IS CONSIDERED REPRESENTATIVE OF 007; 009 IS CONSIDERED REPRESENTATIVE OF OUTFALLS 008 AND 011; OUTFALL 012 IS CONSIDERED REPRESENTATIVE OF OUTFALLS 013 AND 014

VI. Significant Leaks or Spills

Provide existing information regarding the history of significant leaks or spills of toxic or hazardous pollutants at the facility in the last three years, including the approximate date and location of the spill or leak, and the type and amount of material released.

1) FEBRUARY 8, 2014 (OFF MILL PROPERTY ADJACENT TO OUTFALLS 008 AND 009): LEACHATE FORCE MAIN BREAK BETWEEN LANDFILL AND MILL EFFLUENT TREATMENT PLANT DUE TO EXCAVATION OF A DRAINAGE DITCH BY LOCAL LAND LESSEE. APPROXIMATELY 136,800 GALLONS OF LEACHATE DISCHARGED TO UNNAMED SWAMP THAT DRAINS TO WASHOLE CREEK AND BLACKWATER RIVER. FORCE MAIN PUMPS SHUT DOWN UPON DISCOVERY. PIPE REPAIRED ON 2/20 AND CLEANUP OF RESIDUAL LEACHATE IN DRAINAGE DITCH OCCURRED 2/21-2/22 (DITCH BOTTOM EXCAVATED AND MATERIAL DUMPED IN LANDFILL). FORCE MAIN UTILITY LOCATION RE-MARKED TO PREVENT FUTURE OCCURRENCE.

2) MARCH 20, 2015 (OUTFALL 002): MIXTURE OF WHITE, GREEN AND BLACK LIQUOR DISCHARGED WHEN A PLUG IN THE RECLAIM LINE FOR THE OLD TANK FARM VIBRATED LOOSE AND APPROXIMATELY 100 GALLONS OF MIXED LIQUORS SPRAYED FROM THE PIPING INTO OUTFALL 002 DRAINAGE AREA BEFORE FLOW WAS SHUT OFF. LIQUID POOLED LOCALLY, AND TEMPORARY EARTH DIKES WERE CONSTRUCTED TO PREVENT MIGRATION. CLEANUP OF RESIDUAL MATERIAL AND SOIL OCCURRED IMMEDIATELY AND THE PIPE WAS REPLUMBED TO DIRECT FLOW INTERNAL TO THE OLD TANK FARM.

Continued from Page 2

EPA ID Number (copy from Item 1 of Form 1)
VAD003112265**VII. Discharge Information**

A, B, C, & D: See instructions before proceeding. Complete one set of tables for each outfall. Annotate the outfall number in the space provided.
Table VII-A, VII-B, VII-C are included on separate sheets numbers VII-1 and VII-2.

E. Potential discharges not covered by analysis – is any toxic pollutant listed in table 2F-2, 2F-3, or 2F-4, a substance or a component of a substance which you currently use or manufacture as an intermediate or final product or byproduct?

☐ Yes (list all such pollutants below)☒ No (go to Section IX)

NO TOXIC POLLUTANTS LISTED IN TABLES 2F-2, 2F-3, OR 2F-4 ARE PRESENT IN MILL DISCHARGES

VIII. Biological Toxicity Testing Data

Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made on any of your discharges or on a receiving water in relation to your discharge within the last 3 years?

☒ Yes (list all such pollutants below)☐ No (go to Section IX)

OUTFALL 001 IS SAMPLED FOR TOXICITY AS DISCUSSED IN FORM 2C ABOVE. NO TOXICITY TESTING IS PERFORMED ON THE STORMWATER OUTFALLS.

IX. Contract Analysis Information

Were any of the analyses reported in Item VII performed by a contract laboratory or consulting firm?

☒ Yes (list the name, address, and telephone number of, and pollutants analyzed by, each such laboratory or firm below)☐ No (go to Section X)

A. Name	B. Address	C. Area Code & Phone No.	D. Pollutants Analyzed
JAMES R. REED & ASSOCIATES	770 PILOT HOUSE DRIVE, NEWPORT, NEWS, VA 23606	757-873-4703	BOD5 TSS COD TKN TN NITRATE/NITRITE TP O&G

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A. Name & Official Title (Type Or Print)

Charles L. Hairston, Mill Manager

B. Area Code and Phone No.

(757) 569-4848

C. Signature



D. Date Signed

5-18-15

FORM 2C —SECTION V.D
International Paper-Franklin Mill
VPDES Permit No VA0004162

The following pollutants from Table 2c-3 are incidental to the kraft pulping and bleaching process and, therefore could potentially be discharged from outfall 001 in trace quantities. No analytical data is available.

1. Acetaldehyde
2. Carbon disulfide
3. Cresol
4. Formaldehyde
5. Isoprene
6. Methyl mercaptan
7. Xylene

(Reference: NCASI Environmental Resource Handbook for Pulp and Paper Mills, Revised March 1, 2002. Table 1.6.3-2 Chemicals on the CERCLA/SARA Lists that are Commonly Found at Pulp and Paper Mills)

In addition to those pollutants listed above, the following Hazardous Substances from Table 2c-4 are also used in and around or are incidental to the kraft pulping, bleaching and papermaking processes and, while not intentionally or routinely discharged, they could potentially be discharged from outfall 001

Substance	Source	Max Potential Spill Quantity(lbs)
Acrolein	Incidental by product	Negligible
Aluminum Sulfate *	Storage tank	140,000
Ammonia	Storage tank	8,000
Chloroform	Incidental byproduct	Negligible (internal outfall data reported on
Ferric Sulfate *	Storage tank	48,000
Hydrochloric acid *	Storage tank	250,000
Hydrogen sulfide	Incidental byproduct	Negligible
Nitric acid *	Storage tank	12,000
Pentachlorophenol	Incidental byproduct	Negligible (ND in form 2C testing)
Phosphoric acid *	Storage tank	7,000
Sodium hydrosulfide	Storage tank, rail car	140,000
Sodium hydroxide •	Storage tank	2,200,000
Sodium hypochlorite •	Storage tank	132,000
Sulfuric acid *	Storage tank, rail car	3,200,000

The mill's effluent treatment system is capable of treating and/or reducing the concentrations of the substances listed above through mixing, dilution,

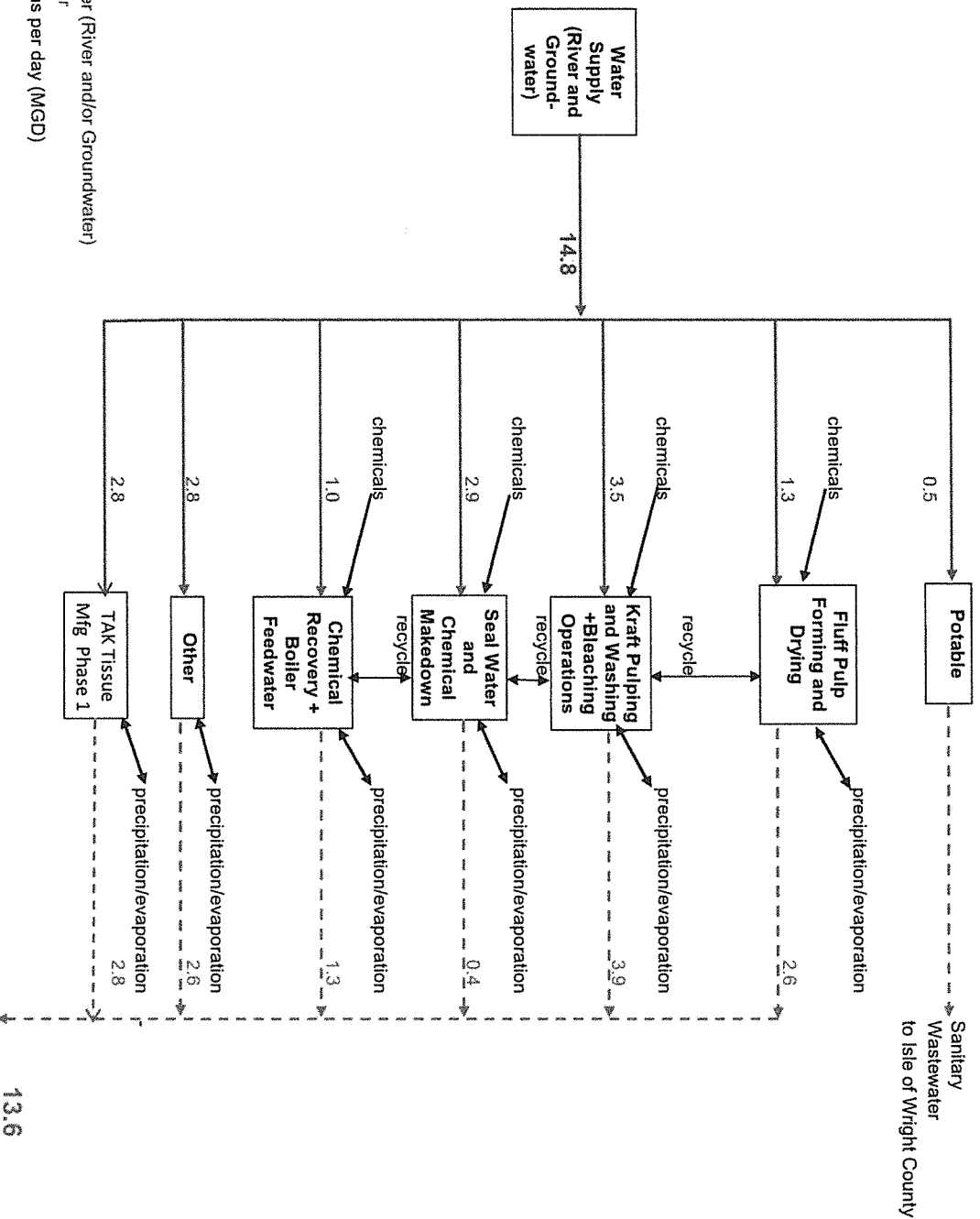
neutralization, oxidation, flocculation/settling, and/or biological treatment to reduce organics.

The mill's VPDES permit contains a pH limitation of 6.0 to 9.0. The pH of the effluent is monitored at Outfall 001 and serves as an indicator of the effectiveness of the neutralization of the acidic and caustic substances noted with an asterisk above. The pH limit controls the releases of these substances by requiring our effluent to fall in the neutral range of 6.0 to 9.0. We identify these substances as part of this application and feel the limitation of pH fulfills the requirements allowing discharges of these substances to be excluded from the requirements of Section 311 as described in Section 117.12 of 40 CFR.

The mill's VPDES Permit includes chloroform limitations and monitoring requirements at internal outfall 103. Thus the limitation of chloroform fulfills the requirements allowing discharges of chloroform to be excluded from the requirements of Section 311 as described in Section 117.12 of 40 CFR.

Similarly, the VPDES Permit limitations on BOD and AOX at outfall 001 would fulfill the requirements allowing discharges of the remainder of the noted substances to be excluded from the requirements of Section 311 as described in Section 117.12 of 40 CFR.

Water Flow Line Drawing Form 2C Section II.A



Legend

→ Fresh Water (River and/or Groundwater)
 - - - - - → Wastewater

Flows are in million gallons per day (MGD)

Each additional Phase of TAK adds additional flow to treatment system (4 total Phases)

*Phase II adds 2.11 MGD to treatment system

*Phase III adds 2.63 MGD to treatment system (and water usage is 2.11+0.52 to FRP= 2.63 MGD)

*Phase IV adds 2.11 MGD to treatment system

Please print or type in the unshaded areas only.

[illegible]

OUTFALL 002

Pollutant and CAS Number (if available)	Maximum Values (include units)		Average Values (include units)		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
Oil and Grease	<5.0	N/A	N/A	N/A	1.00	RAIL CAR STORAGE
Biological Oxygen Demand (BOD5)	2 mg/L	N/A	N/A	N/A	1.00	RAIL CAR STORAGE
Chemical Oxygen Demand (COD)	26 mg/l	N/A	N/A	N/A	1.00	RAIL CAR STORAGE
Total Suspended Solids (TSS)	78 mg/L	N/A	N/A	N/A	1.00	RAIL CAR STORAGE
Total Nitrogen	14 mg/l	N/A	N/A	N/A	1.00	RAIL CAR STORAGE
Total Phosphorus	0.15 mg/L	N/A	N/A	N/A	1.00	RAIL CAR STORAGE
pH	Minimum 6.77	Maximum 6.77	Minimum	Maximum		RAIL CAR STORAGE

[illegible]

Continued from the Front

Part C - List each pollutant shown in Table 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. See the instructions for additional details and requirements. Complete one table for each outfall.

[illegible]

Part D — Provide data for the storm event(s) which resulted in the maximum values for the flow weighted composite sample.

1. Date of Storm Event	2. Duration of Storm Event (in minutes)	3. Total rainfall during storm event (in inches)	4. Number of hours between beginning of storm measured and end of previous measurable rain event	5. Maximum flow rate during rain event (gallons/minute or specify units)	6. Total flow from rain event (gallons or specify units)
3/19/15 - 3/20/15	900	0.22	123	.011 INCHES PER HOUR	.006 MILLION GALLONS

7. Provide a description of the method of flow measurement or estimate.

THE RATIONALE METHOD WAS USED TO ESTIMATE FLOW RATE AND TOTAL FLOW. RUNOFF COEFFIECIENTS FOR GRAVELED AREAS AND LAWN/FOREST AREAS WERE APPLIED

OUTFALL 006

Part A -- You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.

Pollutant and CAS Number (if available)	Maximum Values (include units)		Average Values (include units)		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
Oil and Grease	<5.0	N/A	N/A	N/A	1.00	RAIL CAR AND LOCOMOTIVE STORAGE
Biological Oxygen Demand (BOD5)	6 mg/L	N/A	N/A	N/A	1.00	RAIL CAR AND LOCOMOTIVE STORAGE
Chemical Oxygen Demand (COD)	37 mg/L	N/A	N/A	N/A	1.00	RAIL CAR AND LOCOMOTIVE STORAGE
Total Suspended Solids (TSS)	104 mg/L	N/A	N/A	N/A	1.00	RAIL CAR AND LOCOMOTIVE STORAGE
Total Nitrogen	0.7 mg/L	N/A	N/A	N/A	1.00	RAIL CAR AND LOCOMOTIVE STORAGE
Total Phosphorus	0.20	N/A	N/A	N/A	1.00	RAIL CAR AND LOCOMOTIVE STORAGE
pH	Minimum 6.88	Maximum 6.88	Minimum	Maximum		RAIL CAR AND LOCOMOTIVE STORAGE

Part B -- List each pollutant that is limited in an effluent guideline which the facility is subject to or any pollutant listed in the facility's NPDES permit for its process wastewater (if the facility is operating under an existing NPDES permit). Complete one table for each outfall. See the instructions for additional details and requirements.

[illegible]

Continued from the Front

Part C - List each pollutant shown in Table 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. See the instructions for additional details and requirements. Complete one table for each outfall.

[illegible]

Part D — Provide data for the storm event(s) which resulted in the maximum values for the flow weighted composite sample.

1. Date of Storm Event	2. Duration of Storm Event (in minutes)	3. Total rainfall during storm event (in inches)	4. Number of hours between beginning of storm measured and end of previous measurable rain event	5. Maximum flow rate during rain event (gallons/minute or specify units)	6. Total flow from rain event (gallons or specify units)
3/19/15 - 3/20/15	900	0.22	123	.011 INCHES PER HOUR	.012 MILLION GALLONS

7. Provide a description of the method of flow measurement or estimate.

THE RATIONALE METHOD WAS USED TO ESTIMATE FLOW RATE AND TOTAL FLOW. RUNOFF COEFFICIENTS FOR GRAVELED AREAS AND LAWN/FOREST AREAS WERE APPLIED

Part A – You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.

Part B –	List each pollutant that is limited in an effluent guideline which the facility is subject to or any pollutant listed in the facility's NPDES permit for its process wastewater (if the facility is operating under an existing NPDES permit). Complete one table for each outfall. See the instructions for additional details and requirements.
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EPA Form 3510-2F (1-92) Page VII-1 Continue on Reverse

Continued from the Front

Part C - List each pollutant shown in Table 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. See the instructions for additional details and requirements. Complete one table for each outfall.

[illegible]

Part D -- Provide data for the storm event(s) which resulted in the maximum values for the flow weighted composite sample.

1. Date of Storm Event	2. Duration of Storm Event (in minutes)	3. Total rainfall during storm event (in inches)	4. Number of hours between beginning of storm measured and end of previous measurable rain event	5. Maximum flow rate during rain event (gallons/minute or specify units)	6. Total flow from rain event (gallons or specify units)
2/9/15 - 2/10/15	600	0.24	168	0.017 INCHES / HOUR	0.046 MILLION GALLONS

7. Provide a description of the method of flow measurement or estimate.

THE RATIONALE METHOD WAS USED TO ESTIMATE FLOW RATE AND TOTAL FLOW. RUNOFF COEFFICIENTS FOR GRAVELED AREAS AND LAWN/FOREST AREAS WERE APPLIED

OUTFALL 012

Pollutant and CAS Number (if available)	Maximum Values (include units)		Average Values (include units)		Number of Storm Events Sampled	Sources of Pollutants
	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 20 Minutes	Flow-Weighted Composite		
Oil and Grease	<5.0	N/A	N/A	N/A	1.00	EMPTY & FULL TRUCKS IN PARKING AREA
Biological Oxygen Demand (BOD5)	2 mg/L	N/A	N/A	N/A	1.00	EMPTY & FULL TRUCKS IN PARKING AREA
Chemical Oxygen Demand (COD)	<10 mg/L	N/A	N/A	N/A	1.00	EMPTY & FULL TRUCKS IN PARKING AREA
Total Suspended Solids (TSS)	78 mg/L	N/A	N/A	N/A	1.00	EMPTY & FULL TRUCKS IN PARKING AREA
Total Nitrogen	<0.5 mg/L	N/A	N/A	N/A	1.00	EMPTY & FULL TRUCKS IN PARKING AREA
Total Phosphorus	0.15	N/A	N/A	N/A	1.00	EMPTY & FULL TRUCKS IN PARKING AREA
pH	Minimum 6.92	Maximum 6.92	Minimum	Maximum		EMPTY & FULL TRUCKS IN PARKING AREA

[illegible]

Continued from the Front

Part C - List each pollutant shown in Table 2F-2, 2F-3, and 2F-4 that you know or have reason to believe is present. See the instructions for additional details and requirements. Complete one table for each outfall.

[illegible]

Part D — Provide data for the storm event(s) which resulted in the maximum values for the flow weighted composite sample.

1. Date of Storm Event	2. Duration of Storm Event (in minutes)	3. Total rainfall during storm event (in inches)	4. Number of hours between beginning of storm measured and end of previous measurable rain event	5. Maximum flow rate during rain event (gallons/minute or specify units)	6. Total flow from rain event (gallons or specify units)
3/19/15 - 3/20/15	900	0.22	123	0.011 INCHES / HOUR	0.011 MILLION GALLONS

7. Provide a description of the method of flow measurement or estimate.

THE RATIONALE METHOD WAS USED TO ESTIMATE FLOW RATE AND TOTAL FLOW. RUNOFF COEFFICIENTS FOR GRAVELED AREAS AND LAWN/FOREST AREAS WERE APPLIED

PLEASE PRINT OR TYPE IN THE UNSHADED AREAS ONLY. You may report some or all of this information on separate sheets (use the same format) instead of completing these pages.
SEE INSTRUCTIONS.

EPA I.D. NUMBER (copy from Item 1 of Form 1)
VAD003112265

V. INTAKE AND EFFLUENT CHARACTERISTICS (continued from page 3 of Form 2-C)												OUTFALL NO. 001			
PART A - You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.															
1. POLLUTANT		2. EFFLUENT				3. UNITS (specify if blank)				4. INTAKE (optional)					
		a. MAXIMUM DAILY VALUE (1)		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCENTRATION		b. MASS	a. LONG TERM AVERAGE VALUE (1)		b. NO. OF ANALYSES	
		CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS								CONCENTRATION
a. Biochemical Oxygen Demand (BOD ₅)		23	27,253	10.3	13,928	6.2	8,154	7	mg/L	1b					
b. Chemical Oxygen Demand (COD)		272	410,809	242	338,380	227	315,725	7	mg/L	1b					
c. Total Organic Carbon (TOC)		56.4	58,828	--	--	--	--	1	mg/L	1b					
d. Total Suspended Solids (TSS)		20	25,676	11.6	15,865	8.9	12,052	7	mg/L	1b					
e. Ammonia (as N)		1.08	1,631	0.57	818	0.29	424	7	mg/L	1b					
f. Flow		VALUE	181	VALUE	134	VALUE	103	7	MGD	--					
g. Temperature (winter)		VALUE	41 F	VALUE	NA	VALUE	NA		°C						
h. Temperature (summer)		VALUE	NA	VALUE	NA	VALUE	NA		°C						
i. pH		MINIMUM 6.9	MAXIMUM 8.2	MINIMUM	MAXIMUM			7	STANDARD UNITS						
PART B -- Mark "X" in column 2-a for each pollutant you know or have reason to believe is present. Mark "X" in column 2-b for each pollutant you believe to be absent. If you mark column 2a for any pollutant which is limited either directly, or indirectly but expressly, in an effluent limitations guideline, you must provide the results of at least one analysis for that pollutant. For other pollutants for which you mark column 2a, you must provide quantitative data or an explanation of their presence in your discharge. Complete one table for each outfall. See the instructions for additional details and requirements.															
1. POLLUTANT AND CAS NO. (if available)		2. MARK "X"		3. EFFLUENT				4. UNITS				5. INTAKE (optional)			
a. BELIEVED PRESENT	b. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE (1)		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE (1)		b. NO. OF ANALYSES		
		CONCENTRATION	(2) MASS	CONCENTRATION	(2) MASS	CONCENTRATION	(2) MASS				CONCENTRATION	(2) MASS			
a. Bromide (24959-67-9)	X		13.0	13,560				1	mg/L	1b					
b. Chlorine, Total Residual	X		0.06	63				1	mg/L	1b					
c. Color	X		622	--				1	pcu	--					
d. Fecal Coliform	X		130	--				1	MPN100mL	--					
e. Fluoride (16984-48-8)	X		2.78	2,900				1	mg/L	1b					
f. Nitrate-Nitrite (as N)	X		0.22	229				1	mg/L	1b					

ITEM V-B CONTINUED FROM FRONT

1. POLLUTANT AND CAS NO. (if available)	2. MARK "X"		3. EFFLUENT				4. UNITS			5. INTAKE (optional)		
	a. BELIEVED PRESENT	b. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS		(1) CONCENTRATION	(2) MASS	
g. Nitrogen, Total Organic (as N)	X		2.8	3,645					7	mg/L	lb	
h. Oil and Grease		X	<5.0	--					1	mg/L	--	
i. Phosphorus (as P), Total (7723-14-0)	X		1.1	1,488					7	mg/L	lb	
j. Radioactivity												
(1) Alpha, Total	X		0.86	--					1	pCi/L	--	
(2) Beta, Total	X		20.7	--					1	pCi/L	--	
(3) Radium, Total	X		0.248	--					1	pCi/L	--	
(4) Radium 226, Total	X		0.734	--					1	pCi/L	--	
k. Sulfate (as SO ₄) (14808-79-8)	X		169	176,175					1	mg/L	lb	
l. Sulfide (as S)		X	<0.2	--					1	mg/L	--	
m. Sulfite (as SO ₃) (14265-45-3)	X		1.6	1,669					1	mg/L	--	
n. Surfactants		X	<0.10	--					1	mg/L	--	
o. Aluminum, Total (7429-90-5)	X		0.562	586					1	mg/L	lb	
p. Barium, Total (7440-39-3)	X		0.085	89					1	mg/L	lb	
q. Boron, Total (7440-42-8)	X		0.943	984					1	mg/L	lb	
r. Cobalt, Total (7440-48-4)		X	<0.005	--					1	mg/L	--	
s. Iron, Total (7439-89-6)	X		0.547	571					1	mg/L	--	
t. Magnesium, Total (7439-95-4)	X		5.13	5,351					1	mg/L	lb	
u. Molybdenum, Total (7439-98-7)		X	<0.005	--					1	mg/L	--	
v. Manganese, Total (7439-96-5)	X		0.270	282					1	mg/L	--	
w. Tin, Total (7440-31-5)		X	<0.005	--					1	mg/L	--	
x. Titanium, Total (7440-32-6)	X		0.010	10					1	mg/L	--	

CONTINUED FROM PAGE 3 OF FORM 2-C

EPA I.D. NUMBER (copy from Item 1 of Form 1)	OUTFALL NUMBER
VAD003112265	001

PART C - If you are a primary industry and this outfall contains process wastewater, refer to Table 2c-2 in the instructions to determine which of the GC/MS fractions you must test for. Mark "X" in column 2-a for all such GC/MS fractions that apply to your industry and for ALL toxic metals, cyanides, and total phenols. If you are not required to mark column 2-a (secondary industries, nonprocess wastewater outfalls, and nonrequired GC/MS fractions), mark "X" in column 2-b for each pollutant you know or have reason to believe is present. Mark "X" in column 2-c for each pollutant you believe is absent. If you mark column 2a for any pollutant, you must provide the results of at least one analysis for that pollutant. If you mark column 2b for any pollutant, you must provide the results of at least one analysis for each of these pollutants which you know or have reason to believe that you discharge in concentrations of 100 ppb or greater. Otherwise, for pollutants for which you mark column 2b, you must either submit at least one analysis or briefly describe the reasons the pollutant is expected to be discharged. Note that there are 7 pages to this part; please review each carefully. Complete one table (all 7 pages) for each outfall. See instructions for additional details and requirements.

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"			3. EFFLUENT				4. UNITS		5. INTAKE (optional)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE (1) CONCENTRATION	b. MAXIMUM 30 DAY VALUE (if available)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE (1) CONCENTRATION		b. NO. OF ANALYSES
					(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
METALS, CYANIDE, AND TOTAL PHENOLS												
1M. Antimony, Total (7440-36-0)	X		X	<0.005	--	--	1	mg/L	--			
2M. Arsenic, Total (7440-38-2)	X		X	<0.005	--	--	1	mg/L	--			
3M. Beryllium, Total (7440-41-7)	X		X	<0.0005	--	--	1	mg/L	--			
4M. Cadmium, Total (7440-43-9)	X		X	<0.0005	--	--	1	mg/L	--			
5M. Chromium, Total (7440-47-3)	X			0.002	2		1	mg/L	1b			
6M. Copper, Total (7440-50-8)	X		X	<0.002	--	--	1	mg/L	--			
7M. Lead, Total (7439-92-1)	X		X	<0.005	--	--	1	mg/L	--			
8M. Mercury, Total (7439-97-6)	X		X	<0.0002	--	--	1	mg/L	--			
9M. Nickel, Total (7440-02-0)	X		X	<0.005	--	--	1	mg/L	--			
10M. Selenium, Total (7782-49-2)	X		X	<0.005	--	--	1	mg/L	--			
11M. Silver, Total (7440-22-4)	X		X	<0.001	--	--	1	mg/L	--			
12M. Thallium, Total (7440-28-0)	X		X	<0.005	--	--	1	mg/L	--			
13M. Zinc, Total (7440-66-6)	X			0.017	12		1	mg/L	--			
14M. Cyanide, Total (57-12-5)	X		X	<0.005	--	--	1	mg/L	--			
15M. Phenols, Total	X		X	<0.02	--	--	1	mg/L	--			
DIOXIN												
2,3,7,8-Tetra-chlorodibenzo-P-Dioxin (1764-01-6)	X											
				DESCRIBE RESULTS <10 PG/L, BELOW DETECTION LIMIT, n=2								

CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT				4. UNITS		5. INTAKE (optional)			
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – VOLATILE COMPOUNDS													
1V. Acrolein (107-02-8)	X		X	<50	--			1	ug/L	--			
2V. Acrylonitrile (107-13-1)	X		X	<50	--			1	ug/L	--			
3V. Benzene (71-43-2)	X		X	<5	--			1	ug/L	--			
4V. Bis (4-Chloro-nitrophenyl) Ether (542-88-1)	X		X	<5	--			1	ug/L	--			
5V. Bromoform (75-25-2)	X		X	<5	--			1	ug/L	--			
6V. Carbon Tetrachloride (56-23-5)	X		X	<5	--			1	ug/L	--			
7V. Chlorobenzene (108-90-7)	X		X	<5	--			1	ug/L	--			
8V. Chlorodibromomethane (124-48-1)	X		X	<5	--			1	ug/L	--			
9V. Chloroethane (75-00-3)	X		X	<5	--			1	ug/L	--			
10V. 2-Chloroethylvinyl Ether (110-75-8)	X		X	<10	--			1	ug/L	--			
11V. Chloroform (67-66-3)	X		X	<5	--			1	ug/L	--			
12V. Dichlorobromomethane (75-27-4)	X		X	<5	--			1	ug/L	--			
13V. Dichlorodifluoromethane (75-71-8)	X		X	<5	--			1	ug/L	--			
14V. 1,1-Dichloroethane (75-34-3)	X		X	<5	--			1	ug/L	--			
15V. 1,2-Dichloroethane (107-06-2)	X		X	<5	--			1	ug/L	--			
16V. 1,1-Dichloroethylene (75-35-4)	X		X	<5	--			1	ug/L	--			
17V. 1,2-Dichloropropane (78-87-5)	X		X	<5	--			1	ug/L	--			
18V. 1,3-Dichloropropylene (542-75-6)	X		X	<5	--			1	ug/L	--			
19V. Ethylbenzene (100-41-4)	X		X	<5	--			1	ug/L	--			
20V. Methyl Bromide (74-83-9)	X		X	<5	--			1	ug/L	--			
21V. Methyl Chloride (74-87-3)	X		X	<5	--			1	ug/L	--			

CONTINUED FROM PAGE V-4

1. POLLUTANT AND CAS NUMBER <i>(if available)</i>	2. MARK "X"			3. EFFLUENT						4. UNITS		5. INTAKE <i>(optional)</i>			
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE		c. LONG TERM AVRG. VALUE <i>(if available)</i>		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – VOLATILE COMPOUNDS <i>(continued)</i>															
22V. Methylene Chloride (75-09-2)	X		X	<5	--					1	ug/L	--			
23V. 1,1,2,2-Tetrachloroethane (79-34-5)	X		X	<5	--					1	ug/L	--			
24V. Tetrachloroethylene (127-18-4)	X		X	<5	--					1	ug/L	--			
25V. Toluene (108-88-3)	X		X	<5	--					1	ug/L	--			
26V. 1,2-Trans-Dichloroethylene (156-60-5)	X		X	<5	--					1	ug/L	--			
27V. 1,1,1-Trichloroethane (71-55-6)	X		X	<5	--					1	ug/L	--			
28V. 1,1,2-Trichloroethane (79-00-5)	X		X	<5	--					1	ug/L	--			
29V. Trichloroethylene (79-01-6)	X		X	<5	--					1	ug/L	--			
30V. Trichlorofluoromethane (75-69-4)	X		X	<5	--					1	ug/L	--			
31V. Vinyl Chloride (75-01-4)	X		X	<5	--					1	ug/L	--			
GC/MS FRACTION – ACID COMPOUNDS															
1A. 2-Chlorophenol (95-57-8)	X		X	<5	--					1	ug/L	--			
2A. 2,4-Dichlorophenol (120-83-2)	X		X	<5	--					1	ug/L	--			
3A. 2,4-Dimethylphenol (105-67-9)	X		X	<5	--					1	ug/L	--			
4A. 4,6-Dinitro-O-Cresol (534-52-1)	X		X	<5	--					1	ug/L	--			
5A. 2,4-Dinitrophenol (51-28-5)	X		X	<20	--					1	ug/L	--			
6A. 2-Nitrophenol (88-75-5)	X		X	<5	--					1	ug/L	--			
7A. 4-Nitrophenol (100-02-7)	X		X	<5	--					1	ug/L	--			
8A. P-Chloro-M-Cresol (59-50-7)	X		X	<5	--					1	ug/L	--			
9A. Pentachlorophenol (87-86-5)	X		X	<10	--					1	ug/L	--			
10A. Phenol (108-95-2)	X		X	<5	--					1	ug/L	--			
11A. 2,4,6-Trichlorophenol (88-05-2)	X		X	<5	--					1	ug/L	--			

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CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NUMBER <i>(if available)</i>	2. MARK "X"			3. EFFLUENT						4. UNITS		5. INTAKE <i>(optional)</i>			
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE		c. LONG TERM AVRG. VALUE <i>(if available)</i>		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – BASE/NEUTRAL COMPOUNDS															
1B. Acenaphthene (83-32-9)	X		X	<5	--					1	ug/L	--			
2B. Acenaphthylene (208-96-8)	X		X	<5	--					1	ug/L	--			
3B. Anthracene (120-12-7)	X		X	<5	--					1	ug/L	--			
4B. Benzidine (92-87-5)	X		X	<5	--					1	ug/L	--			
5B. Benzo (a) Anthracene (56-55-3)	X		X	<5	--					1	ug/L	--			
6B. Benzo (a) Pyrene (50-32-8)	X		X	<5	--					1	ug/L	--			
7B. 3,4-Benzo-fluoranthene (205-99-2)	X		X	<5	--					1	ug/L	--			
8B. Benzo (ghi) Perylene (191-24-2)	X		X	<5	--					1	ug/L	--			
9B. Benzo (k) Fluoranthene (207-08-9)	X		X	<5	--					1	ug/L	--			
10B. Bis (2-Chloro-ethoxy) Methane (111-91-1)	X		X	<5	--					1	ug/L	--			
11B. Bis (2-Chloro-ethyl) Ether (111-44-4)	X		X	<5	--					1	ug/L	--			
12B. Bis (2-Chloroisopropyl) Ether (102-80-1)	X		X	<5	--					1	ug/L	--			
13B. Bis (2-Ethylhexyl) Phthalate (117-81-7)	X		X	<5	--					1	ug/L	--			
14B. 4-Bromophenyl Phenyl Ether (101-55-3)	X		X	<5	--					1	ug/L	--			
15B. Butyl Benzyl Phthalate (85-68-7)	X		X	<5	--					1	ug/L	--			
16B. 2-Chloronaphthalene (91-58-7)	X		X	<5	--					1	ug/L	--			
17B. 4-Chlorophenyl Phenyl Ether (7005-72-3)	X		X	<5	--					1	ug/L	--			
18B. Chrysene (218-01-9)	X		X	<5	--					1	ug/L	--			
19B. Dibenzo (a,h) Anthracene (53-70-3)	X		X	<5	--					1	ug/L	--			
20B. 1,2-Dichlorobenzene (95-50-1)	X		X	<5	--					1	ug/L	--			
21B. 1,3-Di-chlorobenzene (541-73-1)	X		X	<5	--					1	ug/L	--			

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT				4. UNITS		5. INTAKE (optional)			
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE (1) CONCENTRATION	(2) MASS	b. MAXIMUM 30 DAY VALUE (if available)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
						(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – BASE/NEUTRAL COMPOUNDS (continued)													
22B. 1,4-Dichloro-benzene (106-46-7)	X		X	<5	--			1	ug/L	--			
23B. 3,3-Dichloro-benzidine (91-94-1)	X		X	<5	--			1	ug/L	--			
24B. Diethyl Phthalate (84-66-2)	X		X	<5	--			1	ug/L	--			
25B. Dimethyl Phthalate (131-11-3)	X		X	<5	--			1	ug/L	--			
26B. Di-N-Butyl Phthalate (84-74-2)	X		X	<5	--			1	ug/L	--			
27B. 2,4-Dinitro-toluene (121-14-2)	X		X	<5	--			1	ug/L	--			
28B. 2,6-Dinitro-toluene (606-20-2)	X		X	<5	--			1	ug/L	--			
29B. Di-N-Octyl Phthalate (117-84-0)	X		X	<5	--			1	ug/L	--			
30B. 1,2-Diphenyl-hydrazine (as Azo-benzene) (122-66-7)	X		X	<5	--			1	ug/L	--			
31B. Fluoranthene (206-44-0)	X		X	<5	--			1	ug/L	--			
32B. Fluorene (86-73-7)	X		X	<5	--			1	ug/L	--			
33B. Hexachloro-benzene (118-74-1)	X		X	<5	--			1	ug/L	--			
34B. Hexachloro-butadiene (87-68-3)	X		X	<5	--			1	ug/L	--			
35B. Hexachloro-cyclopentadiene (77-47-4)	X		X	<5	--			1	ug/L	--			
36B. Hexachloro-ethane (67-72-1)	X		X	<5	--			1	ug/L	--			
37B. Indeno (1,2,3-cd) Pyrene (193-39-5)	X		X	<5	--			1	ug/L	--			
38B. Isophorone (78-59-1)	X		X	<5	--			1	ug/L	--			
39B. Naphthalene (91-20-3)	X		X	<5	--			1	ug/L	--			
40B. Nitrobenzene (98-95-3)	X		X	<5	--			1	ug/L	--			
41B. N-Nitro-sodimethylamine (62-75-9)	X		X	<5	--			1	ug/L	--			
42B. N-Nitrosodi-N-Propylamine (621-64-7)	X		X	<5	--			1	ug/L	--			

CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NUMBER (if available)		2. MARK "X"			3. EFFLUENT				4. UNITS			5. INTAKE (optional)		
a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS						
GC/MS FRACTION - BASE/NEUTRAL COMPOUNDS (continued)														
43B. N-Nitro-sodiphenylamine (86-30-6)	X		X	<5	--				1	ug/L	--			
44B. Phenanthrene (85-01-6)	X		X	<5	--				1	ug/L	--			
45B. Pyrene (129-00-0)	X		X	<5	--				1	ug/L	--			
46B. 1,2,4-Tri-chlorobenzene (120-82-1)	X		X	<5	--				1	ug/L	--			
GC/MS FRACTION - PESTICIDES														
1P. Aldrin (309-00-2)	X		X	<5	--				1	ug/L	--			
2P. α-BHC (319-84-6)	X		X	<5	--				1	ug/L	--			
3P. β-BHC (319-85-7)	X		X	<5	--				1	ug/L	--			
4P. γ-BHC (58-89-9)	X		X	<5	--				1	ug/L	--			
5P. δ-BHC (319-86-8)	X		X	<5	--				1	ug/L	--			
6P. Chlordane (57-74-9)	X		X	<5	--				1	ug/L	--			
7P. 4,4'-DDT (50-29-3)	X		X	<5	--				1	ug/L	--			
8P. 4,4'-DDE (72-55-9)	X		X	<5	--				1	ug/L	--			
9P. 4,4'-DDD (72-54-8)	X		X	<5	--				1	ug/L	--			
10P. Dieldrin (60-57-1)	X		X	<5	--				1	ug/L	--			
11P. α-Endosulfan (115-29-7)	X		X	<5	--				1	ug/L	--			
12P. β-Endosulfan (115-29-7)	X		X	<5	--				1	ug/L	--			
13P. Endosulfan Sulfate (1031-07-8)	X		X	<5	--				1	ug/L	--			
14P. Endrin (72-20-8)	X		X	<5	--				1	ug/L	--			
15P. Endrin Aldehyde (7421-93-4)	X		X	<5	--				1	ug/L	--			
16P. Heptachlor (76-44-8)	X		X	<5	--				1	ug/L	--			

EPA I.D. NUMBER (copy from Item 1 of Form 1)	OUTFALL NUMBER
VAD003112265	001

CONTINUED FROM PAGE V-8

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. EFFLUENT				4. UNITS		5. INTAKE (optional)	
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE (if available)		b. MAXIMUM 30 DAY VALUE (if available)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS			
GC/MS FRACTION - PESTICIDES (continued)										
10P. PCB-1242 (53469-21-9)	X		X	<5	--			1	ug/L	--
19P. PCB-1254 (11087-69-1)	X		X	<5	--			1	ug/L	--
20P. PCB-1221 (11104-28-2)	X		X	<5	--			1	ug/L	--
21P. PCB-1232 (11141-16-5)	X		X	<5	--			1	ug/L	--
22P. PCB-1248 (12672-29-6)	X		X	<5	--			1	ug/L	--
23P. PCB-1260 (11096-82-5)	X		X	<5	--			1	ug/L	--
24P. PCB-1016 (12674-11-2)	X		X	<5	--			1	ug/L	--
25P. Toxaphene (8001-35-2)	X		X	<20	--			1	ug/L	--

Form 2F, Item IV.B Narrative Description of Significant Materials

Form 2F, Item IV.C Description of Structural and Non-Structural Control Measures

Outfall 002 discharges into the Blackwater River at the north end of the Mill site. It drains the north rail yard area, where tank cars containing chemicals used in the fluff pulp process are temporarily stored until needed. Tank car unloading of pulping liquors, primarily black liquor and turpentine, occurs on a spur just south of the main tracks in the areas designated for black liquor loading and unloading. Curbing around the loading and unloading area is present to prevent the possible release of liquors should an accidental spill or release occur. In addition, catch basins at the points of loading/unloading are present to prevent the possible release of liquors or turpentine should an accidental spill or release occur. Discharges from the loading and unloading areas flow to the Mill's effluent treatment system which ultimately discharges to Outfall 001; the primary activity in the Outfall 002 drainage area is rail car storage. Water is continuously discharged from Outfall 002, which appears to be generated by groundwater seeping into the pipe and a drainage ditch that extends from Beaverdam Swamp to the north rail yard.

Outfall 006 discharges into Washole Creek just west of the rail bridge at the south end of the facility. The drainage area is predominantly composed of unpaved surfaces and railroad bed. Tank cars containing chemicals used in the fluff pulp process are temporarily stored on these tracks until needed. A locomotive is parked in this area when not in use that is used to move rail cars from storage up to the north rail yard. When present, the locomotive is parked on sorbent pads to absorb leaks of oil and grease. A shed containing oil drums and spill response materials for the rail yard operator is also located in the drainage area. The outfall pipe at 006 is equipped with a manually operated slide valve that can be closed in the event of a spill. The valve is opened on a monthly basis to ensure proper operation.

Outfall 007 discharges into Washole Creek upstream of Outfall 006. The drainage area is unpaved surfaces and railroad bed. Tank cars containing chemicals used in the fluff pulp process are temporarily stored on these tracks until needed. The outfall pipe at 007 is equipped with a manually operated slide valve that can be closed in the event of a spill. The valve is opened on a monthly basis to ensure proper operation.

Outfalls 008, 009, and 011 discharge into unnamed tributaries to Kingsale Swamp. Each outfall drains areas outside the dike surrounding the landfill as well as the capped portions of the landfill. Water that contacts the landfill waste is segregated by dikes and berms and drains to a leachate collection system from which it is pumped to the industrial effluent system for ultimate discharge via Outfall 001. Stormwater from Outfalls 008, 009, and 011 is directed through sedimentation basins prior to discharge, and discharges from each area are controlled by riser boxes.

Outfall 010 discharges into Washole Creek adjacent to Outfall 006. Discharges are composed entirely of uncontaminated, untreated fresh groundwater from the south well field used in the Mill's industrial processes. The headers at Outfall 010 are periodically opened to perform line flushing of the water supply lines for maintenance purposes. The discharge of any process wastewater or stormwater from this outfall is prohibited.

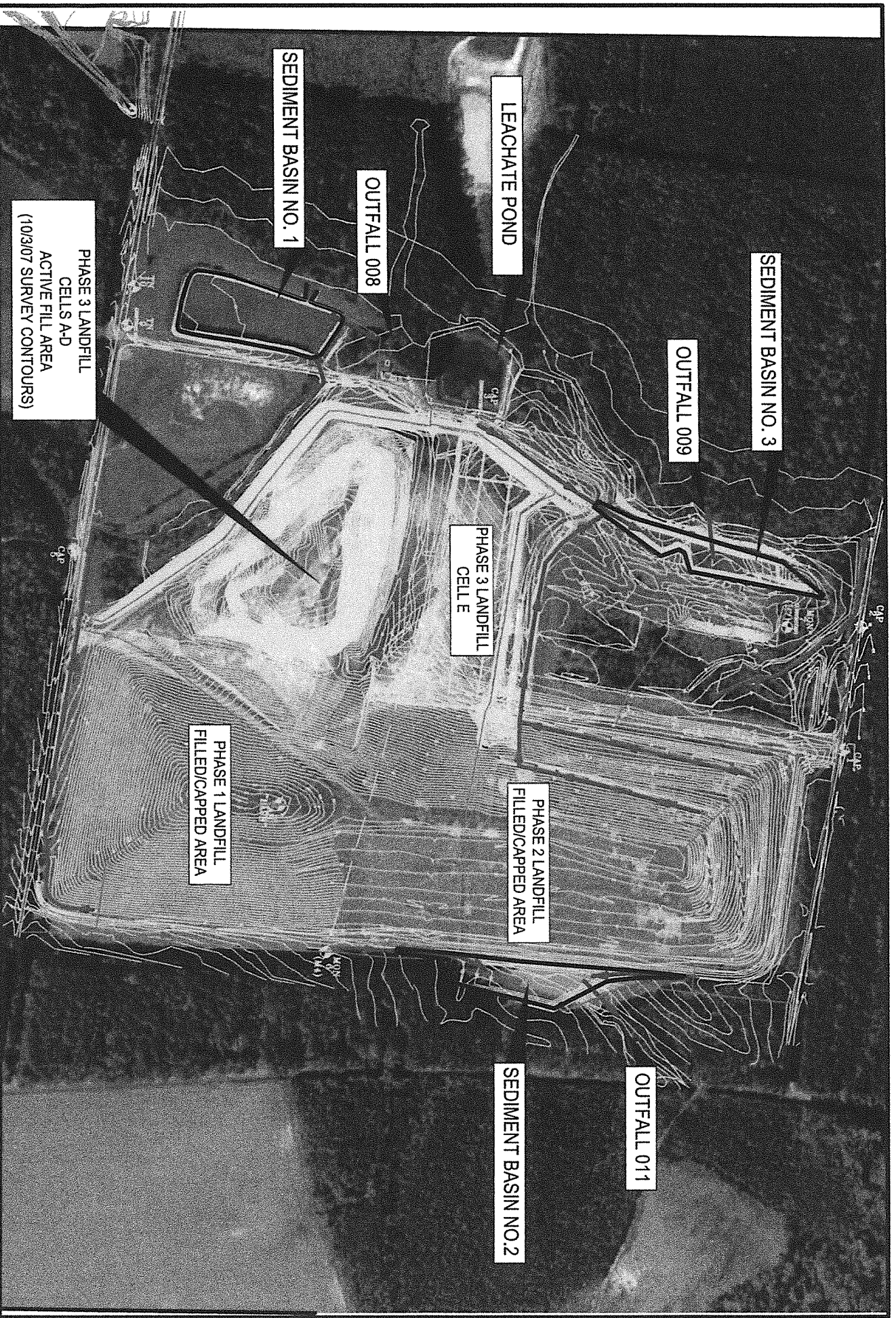
Outfalls 012, 013, and 014 discharge off Mill property and into conveyance systems that eventually reach Washole Creek. Each of the drainage areas are associated with container storage; the Outfall 012 and 013 drainage areas are each used to store containers of finished fluff pulp waiting to be hauled off-site, while the Outfall 014 drainage area is used to clean and store empty truck containers. Each drainage area is covered with gravel and discharges pass through sedimentation basins before flowing off-site. There is no loading or unloading of product or material in these lots.

Outfall 015 discharges into an unnamed tributary to the Blackwater River in the Mill's north well field. Discharges are composed entirely of uncontaminated, untreated fresh groundwater used in the Mill's industrial processes. The headers at Outfall 015 are periodically opened to perform line flushing of the water supply lines for maintenance purposes. The discharge of any process wastewater or stormwater from this outfall is prohibited.

Pollutants stored in rail cars in the drainage areas of Outfalls 002, 006, and/or 007:

- Sulfuric acid (Section 313 Water Priority Chemical)
- Pulping liquors (black, green, and white)
- Sodium hydrosulfide
- Sodium hydroxide
- Sodium chlorate
- Lime
- Turpentine
- Raw wood chips

Non-Structural Control Measures: All outfalls are subject to monthly visual inspections. In addition, all outfalls are addressed in the Stormwater Pollution Prevention Plan (SWPPP) developed for the Mill. Mill employees receive annual training for the SWPPP and other environmental programs, including Spill Prevention, Control, and Countermeasures (SPCC) and the facility Emergency Response Plan. A Hazardous Emergency Action Team (HEAT), consisting of Mill employees, is capable of responding to spills of varying sizes.



SEDIMENT BASIN NO. 3

OUTFALL 009

LEACHATE POND

OUTFALL 008

SEDIMENT BASIN NO. 1

PHASE 3 LANDFILL
CELL E

PHASE 2 LANDFILL
FILLED/CAPPED AREA

PHASE 1 LANDFILL
FILLED/CAPPED AREA

PHASE 3 LANDFILL
CELLS A-D
ACTIVE FILL AREA
(10/3/07 SURVEY CONTOURS)

OUTFALL 011

SEDIMENT BASIN NO. 2



International Paper
NPDES Form 2F, Section III
Map F - Landfill Site Drainage Map

